

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
SPARTANBURG DIVISION**

Gary Nichols and Patricia Nichols,)
) C.A. No.: 7:25-cv-07821-DCC
 Plaintiff,)
)
 v.)
)
 Irakli Darbaidze and Agad, LLC,)
)
 Defendants.)
)
)

**DEFENDANTS' LOCAL
RULE 26.01 ANSWERS**

TO: PLAINTIFFS AND THEIR ATTORNEYS:

Defendants Irakli Darbaidze and Agad, LLC (“Defendants”), by and through undersigned counsel, respond to Local Rule 26.01 Interrogatories as follows

(A) State the full name, address, and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of that interest.

RESPONSE: None to the knowledge of Defendants.

(B) As to each claim, state whether it should be tried jury or nonjury and why.

RESPONSE: Defendants request a jury trial.

(C) State whether the party submitting these responses is a publicly-owned company and separately identify: (1) any parent corporation and any publicly-held corporation owning ten percent (10%) or more of the party’s stock; (2) each publicly-owned company of which it is a parent; and (3) each publicly-owned company in which the party owns ten percent (10%) or more of the outstanding shares.

RESPONSE: Defendant Irakli Darbaidze is an individual. Defendant Agad, LLC is not a publicly owned company.

(D) State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division). *See Local Civ. Rule 3.01 (D.S.C.).*

RESPONSE: The events forming the basis of the complaint, including the alleged collision, occurred in Spartanburg County, South Carolina, which is in the Spartanburg Division.

(E) Is this action related in whole or in part to any other matter filed in this district, whether civil or criminal? If so, provide: (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action. Counsel should disclose any cases that *may be* related regardless of whether they are still pending. Whether cases *are* related such that they should be assigned to a single judge will be determined by the clerk of court based on a determination of whether the cases arise from the same or identical transactions, happenings, or events; involve the identical parties or property; or for any other reason would entail substantial duplication of labor if heard by different judges.

RESPONSE: Defendants are not aware of any related matter filed in this district.

(F) If the defendant is improperly identified, give the proper identification and state whether counsel will accept service of an amended summons and pleading reflecting the correct identification.

RESPONSE: Defendants are properly identified.

(G) If you contend that some other person or legal entity is, in whole or in part, liable to you or the party asserting a claim against you in this matter, identify such person or entity and describe the basis of their liability.

RESPONSE: At this time, Defendants do not assert any person or legal entity not a party to this litigation is liable to Defendants. However, the investigation into the facts and circumstances is ongoing and, therefore, Defendants reserve the right to amend such position.

(H) *Parties or Intervenors in a Diversity Case.* In an action in which jurisdiction is based on diversity under 28 U.S.C. § 1332(a), a party or intervenor must, unless the court orders otherwise, name – and identify the citizenship of – every individual or entity whose citizenship is attributed to that party or intervenor. This response must be supplemented when any later event occurs that could affect the court’s jurisdiction under § 1332(a).

RESPONSE: Defendant Darbaidze is a citizen and resident of the State of Pennsylvania. Defendant Agad, LLC is a limited liability company formed in the State of Pennsylvania, with their principal place of business in the State of Pennsylvania.

This 22nd day of August, 2025.

s/ J. Alexander Timmons

J. Alexander Timmons (#10862)
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